

Richard J. Reynolds (NSBN 11864)  
E-mail: rreynolds@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1851 East First Street, Suite 1550  
Santa Ana, CA 92705-4067  
Tel: 949.863.3363 Fax: 949.863.3350

Michael R. Brooks (NSBN 7287)  
E-mail: [mbrooks@klnevada.com](mailto:mbrooks@klnevada.com)  
**KOLESAR & LEATHAM**  
400 S. Rampart Blvd., Suite 400  
Las Vegas, NV 89145  
Tel: 702.362.7800 Fax: 702.362.9472

Attorneys for Defendant  
MTC FINANCIAL INC. dba TRUSTEE CORPS  
(erroneously named herein as MTC FINANCIAL,  
INC. dba TRUSTEE CORPS

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAEL HILL,

Plaintiff,

V.

WELLS FARGO BANK, N.A., a foreign Corporation; U.S. BANK NATIONAL ASSOCIATION, a foreign corporation; MTC FINANCIAL, INC. dba TRUSTEE CORP., a foreign corporation; and DOES 1 through 10, and ROE CORPORATIONS 1 through 10,

## Defendants.

Case No. 2:18-cv-01350-MMD-PAL

**STIPULATION AND ORDER TO EXTEND  
TIME TO FILE REPLY IN SUPPORT OF  
DEFENDANT MTC FINANCIAL INC. dba  
TRUSTEE CORPS' MOTION TO DISMISS  
AND JOINDER**

**(SECOND REQUEST)**

Plaintiff Michael Hill (“Plaintiff”), by and through his undersigned counsel of record, the law firm of Bowen Law Offices, and Defendant MTC Financial Inc. dba Trustee Corps (“Defendant”), by and through its undersigned counsel of record, the law firms of Burke, Williams & Sorensen, LLP and Kolesar & Leatham, hereby stipulate and request an order from the Court to extend the filing deadline for Defendant’s reply in support of its Motion to Dismiss and Joinder (“Motion to Dismiss”) filed on August 20, 2018 (ECF No. 14). This is the second

1 stipulation for an extension of time for Defendant to file its reply in support of its Motion to  
2 Dismiss.

3 Currently, Defendant's reply in support of its Motion to Dismiss is due no later than  
4 October 3, 2018. Plaintiff and Defendant request a fourteen (14) day extension of time, up to and  
5 including, October 17, 2018, for Defendant to file its reply. Defendant requires additional time to  
6 complete its research to support its reply, in drafting its reply, and time for client review.

7 IT IS STIPULATED AND AGREED by and between Plaintiff and Defendant that  
8 Defendant shall have up to and including October 17, 2018, to file its reply in support of  
9 Defendant's Motion to Dismiss (ECF No. 14).

10 Dated: September 27, 2018

BOWEN LAW OFFICES  
9960 W. Cheyenne Ave., Suite 250  
Las Vegas, NV 89129

13 By: /s/ Daniel Nubel  
14 Jerome R. Bowen, Esq., (NSBN 4540)  
Daniel Nubel, Esq (NSBN 13553)

15 Attorneys for Plaintiff  
16 MICHAEL HILL

17 Dated: September 27, 2018

BURKE, WILLIAMS & SORENSEN, LLP  
1851 East First Street, Suite 1550  
Santa Ana, CA 92705-4067

20 By: /s/ Richard J. Reynolds  
21 Richard J. Reynolds (NSBN 11864)

22 Michael R. Brooks (NSBN 7287)  
KOLESAR & LEATHAM  
23 400 S. Rampart Blvd., Suite, Suite 400  
Las Vegas, NV 89145

24 Attorneys for Defendant  
25 MTC FINANCIAL INC. dba TRUSTEE  
CORPS

27 ///

28 ///

1 IT IS SO ORDERED.  
2  
3

DATED: September 28, 2018

4  
5   
6

MIRANDA M. DU  
UNITED STATES DISTRICT JUDGE

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28